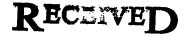
TATE OF SOUTH CAROLINA  Caption of Case)  Petition of South Carolina Electric & Gas Company for Approval to Participate in a Distributed Energy  Resource Program			BEFORE THE  PUBLIC SERVICE COMMISSION  OF SOUTH CAROLINA  COVER SHEET  DOCKET  NUMBER: 2015 - 54 - E		
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ubmitted by:	Robert Guild Attorney at Law		C Dar Numbe	er: <u>2556</u>	PSCSC
ddress:			Telephone:	803 252 1419	MAIL/DMS
	314 Pall Mall	F	Tax:	803 252 1419	
	Columbia, SC 292	01	Other:		
		F	Email: bguild(	@mindspring.com	
Emergency R Other:	D elief demanded in pe	OCKETING INFOR	,	• • •	') 's Agenda expeditiously
INDUSTRY (Check one)		NATURE OF ACTION (Check all that apply)			
Electric		Affidavit	Letter		Request
] Electric/Gas		Agreement	Memorand	um	Request for Certificatio
] Electric/Telecon	mmunications	Answer	☐ Motion		Request for Investigation
] Electric/Water		Appellate Review	Objection		Resale Agreement
] Electric/Water/	Геlecom.	☐ Application	Petition		Resale Amendment
] Electric/Water/Sewer		Brief	Petition for	Reconsideration	Reservation Letter
Gas		Certificate	Petition for	Rulemaking	Response
Railroad		Comments	Petition for l	Rule to Show Cause	Response to Discovery
Sewer		Complaint	Petition to	Intervene	Return to Petition
] Telecommunica	tions	Consent Order	Petition to Ir	ntervene Out of Time	☐ Stipulation
Transportation		Discovery	Prefiled Te	stimony	☐ Subpoena
Water		Exhibit	Promotion		☐ Tariff
] Water/Sewer		Expedited Consideration	Proposed C	Order	Other:
Administrative	Matter	Interconnection Agreement	Protest		
Other:		Interconnection Amendment	Dublisher's	Affidavit	

# ROBERT GUILD Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419



AFR 02 2015

March 31, 2015

PSC SC

Ms. Jocelyn D. Boyd Chief Clerk Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, SC 29211

In Re: Petition of South Carolina Electric & Gas Company for Approval to Participate in a Distributed Energy Resource Program

Docket No. 2015-54-E

Dear Ms. Boyd:

Enclosed please find for filing and consideration a Petition to Intervene on behalf of the Sierra Club, together with Certificate of Service reflecting service upon all parties of record.

With kind regards I am

Robert Guild

Encl.s

CC: All Parties

#### **BEFORE**

## THE PUBLIC SERVICE COMMISSION OF

RECEIVED

**SOUTH CAROLINA** 

APR 02 2015

**DOCKET NO. 2015-54-E** 

PSC SC MAIL / DMS

In Re: Petition of South Carolina Electric &	)
Gas Company for Approval to Participate in a	)
Distributed Energy Resource Program	)

### PETITION TO INTERVENE BY SIERRA CLUB

The Sierra Club, on behalf of its members who are customers of South Carolina Electric & Gas Company, consumers of electrical energy and existing or potential users of distributed energy in South Carolina, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding. In support of this Petition, Sierra Club would respectfully show:

1. The Sierra Club is the oldest and largest non-profit grassroots environmental organization in the world with some 750,000 members, 65 Chapters and over 400 local groups. The South Carolina Chapter has eight local groups with more than 5,000 members across the state. The Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote the responsible use of the earth's ecosystems and resources; to educate and enlist humanity to protect and restore the quality of the natural and human environment; and to use all lawful means to carry out these objectives. The Club and its members actively promote safe energy solutions including energy efficiency and renewable energy resources to combat the climate

crisis and to protect human health and the natural environment. The organization has been actively involved in promoting the development of energy efficiency, solar and other distributed renewable energy production in South Carolina. The South Carolina Chapter of the Club has offices at 1314 Lincoln Street #211, Columbia, South Carolina 29301. Members of the Sierra Club are customers of SCE&G, consumers of electrical energy and existing or potential users of distributed energy in South Carolina, whose interests will be affected by the resolution of issues in this proceeding.

2. Members of the Sierra Club are interested in participating in this proceeding to urge the establishment of fair, just and reasonable terms of service and rates that will encourage the development of net metering, energy efficiency and distributed solar and other renewable energy resources for their future use and consumption in South Carolina.

WHEREFORE: For the foregoing reasons, Sierra Club, on behalf of its members who will be affected by the resolution of issues in this proceeding, hereby petitions the Commission pursuant to R. 103-825 of the Commission's Rules and Regulations to intervene and be made a party of record in the above-referenced proceeding.

Robert Guild

8∱14 Pall Mail

Columbia, South Carolina 29201

SC Bar No. 2358

Bguild@mindspring.com

(803) 252 1419

ATTORNEY FOR SIERRA CLUB

March 31, 2015

### CERTIFICATE OF SERVICE

I hereby certify that on this date I served the above PETITION TO INTERVENE by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

K. Chad Burgess, Esquire Matthew W. Gissendanner, Esquire South Carolina Electric & Gas Company/SCANA 220 Operation Way - MC C222 Cayce, SC 29033-3701

Belton T. Zeigler, Esquire Womble Carlyle Sandridge & Rice, LLP 1727 Hampton Street Columbia, SC 29201

Shannon Bowyer Hudson, Esq. Andrew M. Bateman, Esquire Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, SC 29201

Scott Elliott, Counsel Elliott & Elliott, P.A. 721 Olive Street Columbia, SC, 29205

Stephanie U. Roberts, Esq. Spilman, Thomas & Battle, PLLC 110 Oakwood Drive, suite 500 Winston- Salem, NC 27103

Derrick Price Williamson, Esquire Spilman thomas & Battle, PLLC 1100 Bnet Creek Boulevard, Suite 101 Mechanicsburg, PA 17050

March 31, 2015

Robert Guild